

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

Docket No. 04-10949-NMG

_____	)
ALICE KIEFT,	)
Plaintiff	)
	)
v.	)
	)
AMERICAN EXPRESS COMPANY,	)
ET AL.,	)
Defendants	)
_____	)

**JOINT MOTION TO CONTINUE PRE-TRIAL CONFERENCE AND JURY TRIAL**

The plaintiff and defendants jointly move to continue the pre-trial conference set for September 14, 2006 and jury trial set for September 18, 2006. As grounds for this motion, the parties state:

1. The Court has under advisement pending motions for summary judgment which will affect the issues to be tried in the case.
2. Plaintiff's counsel has a scheduling conflict which prevents him from attending the pre-trial conference set for September 14, 2006, as he is on trial that day. Further, plaintiff's counsel will be unavailable for much of the final week of September, and the first two weeks of October, 2006 due to his upcoming wedding and honeymoon.

WHEREFORE, the parties respectfully request that this Court continue the pre-trial conference and jury trial.

Respectfully submitted,

ALICE KIEFT,  
By her attorney,

/s/ Stephen L. Raymond  
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AMERICAN EXPRESS, ET AL.,  
By their attorneys,

/s/ Constance M. McGrane  
James F. Kavanaugh, Jr. (BBO # 262360)  
Constance M. McGrane (BBO # 546745)  
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Dated: September 7, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by electronic filing on September 7, 2006.

/s/ Constance M. McGrane

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